



April 15, 2025

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Hon. Ronnie Abrams
United States District Court for the Southern District of New York
40 Foley Square, Room 1506
New York, NY 10007

RE: ***Gordon Surgical Group, P.C. et al. v. Empire HealthChoice HMO, Inc. et al.***
Civil Action No. 1:25-cv-03037-RA
Consent Motion for Stay

Your Honor:

We represent Plaintiff in this lawsuit. We jointly submit this letter with Defendants' counsel to request a stay of this action while the parties continue to negotiate a global resolution of Plaintiff's claims in this case and the other cases pending before other courts in this District.

It has taken the parties longer than anticipated to reach a resolution given the number of claims at issue and the age of some of those claims. Thus, in the interest of judicial economy and so as to not further burden the Court, the parties respectfully request a 90-day stay of this action, including all conferences and deadlines. The parties will endeavor to finalize settlement and file a stipulation of dismissal within those 90 days.

We thank Your Honor for your consideration of this matter.

RWB:

cc: Valerie Sirota, Esq.

Respectfully,

A handwritten signature in blue ink, reading "Roy W. Breitenbach".

Roy W. Breitenbach

Application granted. This action is hereby stayed for 90 days from the date of this order. The conference previously scheduled for May 23, 2025 is adjourned *sine die*. The parties shall provide the Court with a status update on June 15, 2025.

SO ORDERED.

A handwritten signature in blue ink, reading "Hon. Ronnie Abrams".

Hon. Ronnie Abrams
April 16, 2025

HARRIS BEACH MURTHA CULLINA PLLC